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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

RICHARD ZEITLIN, ADVANCED
TELEPHONY CONSULTANTS, MRZ
MANAGEMENT, LLC, DONOR
RELATIONS, LLC, TPFE, INC., AMERICAN
TECHNOLOGY SERVICES, COMPLIANCE
CONSULTANTS, CHROME BUILDERS
CONSTRUCTION, INC., and UNIFIED
DATA SERVICES,

Plaintiffs,

v.
BANK OF AMERICA, N.A., and JOHN and
JANE DOES 1, 100

Defendants.

Case No.: 2:18-cv-01919-RFB-BNW

**STIPULATION AND ORDER TO
EXTEND TIME TO FILE RESPONSE
TO AND REPLY IN SUPPORT OF
PLAINTIFFS' REFILED SECOND
MOTION TO COMPEL DISCOVERY
AND FOR SANCTIONS**

(THIRD REQUEST)

Pursuant to Local Rules IA 6-1, 7-1, and 7-2, Plaintiffs Richard Zeitlin; Advanced Telephony Consultants; MRZ Management, LLC; Donor Relations, LLC; TPFE, Inc.; American Technology Services; Compliance Consultants; Chrome Builders Construction, Inc.; and Unified Data Services (the “Plaintiffs”) and Defendant Bank of America, N.A. (“BANA”), by and through their respective undersigned counsel of record, submit this Stipulation and Proposed Order for a 10-day extension of BANA’s deadline to file its response to Plaintiffs’ Refiled Second Motion to Compel Discovery and For Sanctions (ECF No. 195) (the “Motion”). The Motion was

1 filed on October 25, 2021, under seal, and is set for hearing on November 30, 2021. The Parties
 2 request an extension from November 12, 2021, BANA's current deadline to respond, to
 3 November 22, 2021. This is the Parties' third request for an extension of the briefing deadlines
 4 for the Motion.

5 The Parties also request that the deadline for Plaintiffs to file a reply in support of their
 6 Motion be extended to December 6, 2021. Plaintiffs' current deadline to file a reply is November
 7 22, 2021. The Parties also request that the Court reschedule the November 30, 2021 hearing to
 8 December 28, 2021, or another date after December 28, 2021 that is convenient for the Court.

9 This request for an extension is not intended to cause any delay or prejudice to any party.
 10 The reason for the extension is to give the counsel time to evaluate and respond to the arguments
 11 set forth in the Motion and BANA's response to the Motion in light of certain unavoidable and
 12 largely unexpected personal scheduling conflicts, and to account for the intervening Thanksgiving
 13 holiday.

14 IT IS HEREBY STIPULATED AND AGREED by and between the Parties that the time
 15 for BANA to file their response to the Motion is extended to and through November 22, 2021 and
 16 the time for Plaintiffs to file their reply in support of the Motion is extended to and through
 17 December 6, 2021. The Parties also request that the Court reschedule the November 30, 2021
 18 hearing to December 28, 2021, December 29, 2021, any date between January 4, 2022 to January
 19 7, 2022, or another date after January 7, 2022 that is convenient for the Court and the Parties.

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Order

23 /// IT IS ORDERED that ECF No. 199 is
 24 /// GRANTED. IT IS FURTHER ORDERED that
 25 /// the motion hearing set for 11/30/2021 is
 26 /// RESCHEDULED to 1/6/2022 at 11:00 a.m.

27 ///

28 /// **IT IS SO ORDERED**

26 /// **DATED:** 3:10 pm, November 04, 2021



27 /// **BRENDA WEKSLER**
 28 /// **UNITED STATES MAGISTRATE JUDGE**

CERTIFICATE OF SERVICE

I hereby certify that on this date, I electronically filed the foregoing **STIPULATION AND ORDER TO EXTEND TIME TO FILE RESPONSE TO AND REPLY IN SUPPORT OF PLAINTIFFS' REFILED SECOND MOTION TO COMPEL DISCOVERY AND FOR SANCTIONS (THIRD REQUEST)** with the Clerk of the Court for the U. S. District Court, District of Nevada by using the Court's CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system.

DATED: November 3, 2021

/s/ Maricris Williams
An Employee of Snell & Wilmer L.L.P.

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